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June 30, 2016

By e-filing

The Honorable Ronnie Abrams,
United States District Judge,
U.S. District Court for the Southern District of New York,
40 Foley Square, Room 2203,
New York, New York 10097-1312.

Re: *Barkau v. California Resources Corporation*, No. 16-cv-02971

Dear Judge Abrams:

We represent defendant California Resources Corporation in the above-referenced action. Pursuant to the Court's April 25, 2016 Order and Notice of Initial Conference (Doc. No. 4), the Court has scheduled an initial conference for July 8, 2016 and the submission of a joint letter addressing initial pre-trial matters by July 1, 2016.

By way of brief background, Plaintiff's complaint is a putative class action for, *inter alia*, alleged violations of the Trust Indenture Act of 1939. California Resources plans to move to dismiss the complaint, in its entirety, for lack of standing and failure to state a claim. That motion will be filed on July 8 and will be fully briefed on October 7, 2016. In light of the forthcoming motion to dismiss, plaintiff and defendant have conferred and agreed that it would be prudent to request that the Court postpone the initial status conference and the corresponding joint letter submission. Accordingly, the parties respectfully request that the Court adjourn the initial status conference currently scheduled for July 8 and the time to file the corresponding joint letter submission.

We appreciate the Court's attention to this matter. Counsel are available at the Court's convenience to answer any questions.

Respectfully submitted,

/s Darrell S. Cafasso

cc: Plaintiff's Counsel (via ECF and e-mail)